

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re:	)	
	)	Chapter 9
CITY OF DETROIT, MICHIGAN,	)	
	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
SYNCORA GUARANTEE INC.,	)	
	)	
	)	
Plaintiff,	)	Adv. Proc. No. _____
	)	
v.	)	
	)	
UBS AG, SBS FINANCIAL	)	
PRODUCTS COMPANY, LLC, and	)	
MERRILL LYNCH CAPITAL	)	
SERVICES, INC.	)	
	)	
Defendants.	)	
	)	

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICES OF PAPERS**

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**PLEASE TAKE NOTICE** that pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Syncora Guarantee Inc. (“Syncora”), by and through its undersigned counsel, hereby enters its appearance in the above-captioned case and requests that all notices given or

required to be given in this case, and all papers served or required to be served in this case, be given and served at the office, address, and number as follows:

**Susheel Kirpalani**  
**Quinn Emanuel Urquhart & Sullivan, LLP**  
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**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any orders and notice of any application, complaint, demand, motion, petition, pleading, or request whether formal or informal, written or oral, and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, hand delivery, overnight carrier, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that the undersigned intends that neither this Notice of Appearance and Request for Service of Papers (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of the rights of Syncora: (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to

this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Syncora may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments are expressly reserved.

Dated: November 26, 2013

Respectfully submitted,

**Quinn Emanuel Urquhart & Sullivan,  
LLP**

By: /s/ Susheel Kirpalani

**Susheel Kirpalani**

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*Attorneys for Syncora Guarantee Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice of Appearance and Request for Services of Papers* was filed and served via the Court's electronic case filing and noticing system to all parties registered to received electronic notices in this matter this 26<sup>th</sup> day of November, 2013.

/s/ Susheel Kirpalani